

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 23-10831 (MFW)
)

) (Jointly Administered)
)

) **Final Hearing Date:**
) **July 27, 2023 at 9:30 a.m.**
)

) **Final Relief Objection Deadline:**
) **July 20, 2023 at 4:00 p.m.**
)

) **Re: D.I. 12, 61**
)

**NOTICE OF ENTRY OF “INTERIM ORDER (A) AUTHORIZING, BUT NOT
DIRECTING THE DEBTORS TO (I) MAINTAIN EXISTING INSURANCE POLICIES
AND PAY ALL INSURANCE OBLIGATIONS ARISING THEREUNDER AND
(II) RENEW, REVISE, EXTEND, SUPPLEMENT, CHANGE OR ENTER INTO NEW
INSURANCE POLICIES, (B) MODIFYING THE AUTOMATIC STAY WITH
RESPECT TO WORKERS’ COMPENSATION PROGRAMS, AND (C) GRANTING
OTHER RELATED RELIEF” AND FINAL HEARING THEREON**

PLEASE TAKE NOTICE that, on June 27, 2023, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed the *Debtors’ Motion for Entry of Interim and Final Orders (A) Authorizing, But Not Directing the Debtors to (I) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder and (II) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Policies, (B) Modifying Automatic Stay with Respect to Workers’ Compensation Programs, and (C) Granting Other Related Relief* [D.I. 12] (the “**Insurance Motion**”) with the United States Bankruptcy Court

¹ The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

for the District of Delaware (the “**Court**”). A copy of the Insurance Motion is attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that, following an initial hearing to consider the Insurance Motion, on June 28, 2023, the Court entered the *Interim Order (A) Authorizing, But Not Directing the Debtors to (I) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder and (II) Renew, Revise, Extend, Supplement, Change or Enter Into New Insurance Policies, (B) Modifying the Automatic Stay With Respect to Workers’ Compensation Programs, and (C) Granting Other Related Relief* [D.I. 61] (the “**Interim Order**”). A copy of the Interim Order is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Interim Order, objections or responses to the final relief requested in the Insurance Motion, if any, must be made in writing, and filed with the Court on or before **July 20, 2023 at 4:00 p.m. (Eastern Daylight Time)**.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Interim Order, a hearing with respect to the final relief requested in the Insurance Motion, if required, will be held before The Honorable Mary F. Walrath, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 4, Wilmington, Delaware 19801 on **July 27, 2023 starting at 9:30 a.m. (Eastern Daylight Time)**.

PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE INSURANCE MOTION ARE TIMELY FILED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE FINAL RELIEF REQUESTED IN THE INSURANCE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 28, 2023

Respectfully submitted,

/s/ Jason M. Madron

RICHARDS, LAYTON & FINGER, P.A.

Kevin Gross (No. 209)

Daniel J. DeFranceschi (No. 2732)

Paul N. Heath (No. 3704)

Amanda R. Steele (No. 5530)

Jason M. Madron (No. 4431)

One Rodney Square

920 N. King Street

Wilmington, DE 19801

Telephone: (302) 651-7700

Facsimile: (302) 651-7701

gross@rlf.com

defranceschi@rlf.com

heath@rlf.com

steele@rlf.com

madron@rlf.com

WHITE & CASE LLP

Thomas E Lauria (admitted *pro hac vice*)

Matthew C. Brown (admitted *pro hac vice*)

Fan B. He (admitted *pro hac vice*)

200 South Biscayne Boulevard, Suite 4900

Miami, FL 33131

Telephone: (305) 371-2700

tlauria@whitecase.com

mbrown@whitecase.com

fhe@whitecase.com

David M. Turetsky (admitted *pro hac vice*)

1221 Avenue of the Americas

New York, NY 10020

Telephone: (212) 819-8200

david.turetsky@whitecase.com

Jason N. Zakia (admitted *pro hac vice*)

111 South Wacker Drive, Suite 5100

Chicago, IL 60606

Telephone: (312) 881-5400

jzakia@whitecase.com

Roberto Kampfner (admitted *pro hac vice*)

Doah Kim (admitted *pro hac vice*)

RJ Szuba (admitted *pro hac vice*)

555 South Flower Street, Suite 2700

Los Angeles, CA 90071

Telephone: (213) 620-7700

rkampfner@whitecase.com

doah.kim@whitecase.com

rj.szuba@whitecase.com

*Proposed Co-Counsel to Debtors and
Debtors in Possession*